

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
-oOo-**

CRIMINAL INDICTMENT

2:10-CR- 191

**VIOLATIONS:**

29 U.S.C. § 501(c) - Embezzlement from Union  
29 U.S.C. § 439(c) - Falsifying Union Records

## THE GRAND JURY CHARGES THAT:

At all times material to this Indictment, the Laborers' International Union of North America, Local 872 ("the Union"), was a labor organization engaged in an industry affecting commerce, subject to the Labor Management Reporting and Disclosure Act of 1959, 29 U.S.C. § 401, *et seq.*, and required to file an annual financial report with the Secretary of Labor.

**COUNT ONE**  
Embezzlement From Union

From in or about 2006 to in or about April 2009, in the State and Federal District of Nevada,

**AURORA RIOS,**

1 defendant herein, while a person employed directly by the Union, did embezzle, steal and  
2 unlawfully and willfully abstract and convert to her own use the moneys and funds of the  
3 Union, that is, she stole approximately \$167,500 in membership dues and initiation fees paid  
4 by union members on approximately 335 different occasions while employed as a cashier  
5 for the Union.

6 All in violation of Title 29, United States Code, Section 501(c).

7 **COUNT TWO**

8 Falsification of Financial Records Required  
9 To Be Kept by Labor Union  
(2006)

10 From on or about January 1, 2006, to on or about December 31, 2006, in the  
11 State and Federal District of Nevada,

12 **AURORA RIOS,**

13 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record  
14 required to be kept by Title 29, United States Code, Section 436, that is, records and  
15 receipts relating to membership dues and deposits, which are matters required to be  
16 reported in the annual financial report of the Union that is filed with the Secretary of Labor  
17 for the Union's fiscal year ending on December 31, 2006.

18 All in violation of Title 29, United States Code, Section 439(c).

19  
20 **COUNT THREE**

21 Falsification of Financial Records Required  
22 To Be Kept by Labor Union  
(2007)

23 From on or about January 1, 2007, to in or about December 31, 2007, in  
24 the State and Federal District of Nevada,

25 **AURORA RIOS,**  
26

1 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record  
2 required to be kept by Title 29, United States Code, Section 436, that is, records and  
3 receipts relating to membership dues and deposits, which are matters required to be  
4 reported in the annual financial report of the Union that is filed with the Secretary of Labor  
5 for the Union's fiscal year ending on December 31, 2007.

6 All in violation of Title 29, United States Code, Section 439(c).

7 **COUNT FOUR**

8 Falsification of Financial Records Required  
9 To Be Kept by Labor Union  
(2008)

10 From on or about January 1, 2008, to in or about December 31, 2008, in the  
11 State and Federal District of Nevada,

12 **AURORA RIOS,**

13 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record  
14 required to be kept by Title 29, United States Code, Section 436 , that is, records and  
15 receipts relating to membership dues and deposits, which are matters required to be  
16 reported in the annual financial report of the Union that is filed with the Secretary of Labor  
17 for the Union's fiscal year ending on December 31, 2008.

18 All in violation of Title 29, United States Code, Section 439(c).

19 **COUNT FIVE**

20 Falsification of Financial Records Required  
21 To Be Kept by Labor Union  
(2009)

22 From on or about January 1, 2009, to in or about March 23, 2009, in the State  
23 and Federal District of Nevada,

24 **AURORA RIOS,**

25 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record  
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1 required to be kept by Title 29, United States Code, Section 436, that is, records and  
2 receipts relating to membership dues and deposits, which are matters required to be  
3 reported in the annual financial report of the Union that is filed with the Secretary of Labor  
4 for the Union's fiscal year ending on December 31, 2009.

5 All in violation of Title 29, United States Code, Section 439(c).

6 **DATED:** this 28 day of April 2010.

7 **A TRUE BILL:**

8 IS/  
9 FOREPERSON OF THE GRAND JURY

10 DANIEL G. BOGDEN  
11 United States Attorney

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13 KATHRYN C. NEWMAN  
14 Assistant United States Attorney